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April 9, 2001

BY HAND

Brad Botwin, Director
Strategic Analysis Division
Bureau of Export Administration
U.S. Department of Commerce, Room 3876
Washington, D.C. 20230

Re: National Security Investigation of Imports of Iron Ore and Semifinished Steel (66 Fed. Reg. 9067)

Dear Mr. Botwin:

Pursuant to the notice appearing at 66 Fed. Reg. 9067, these comments are submitted on behalf of Duferco Farrell Corporation, a producer in Farrell, Pennsylvania since 1999 of flat-rolled steel products. Duferco Farrell has a production capacity of approximately 1.2 million tons of flat-rolled products and employs over 550 people at its mill in Farrell.

Duferco Farrell does not have the capability to produce steel slab, a semi-finished steel product that is the feedstock for all of the company's product lines. Furthermore, slab is not available on the merchant market from U.S. slab producers, who consume nearly all of their slab output internally in producing their own flat-rolled products. Duferco Farrell is thus dependent

on slab from offshore sources. If access to sufficient slab supply from offshore sources became impeded or prices of that input increased due to import restrictions, the company would be unable to compete in the marketplace. Any import restrictions could threaten the viability of the mill and jobs of over 550 steel workers.

I. History of Duferco Farrell

In December 1998, Duferco purchased the rolling mill in Farrell from Caparo Steel, a company that had closed the mill in October 1997. Caparo Steel had acquired the plant, including the rolling mill and slab production equipment, from Sharon Steel in 1995 after the plant was idle for three years.

The two previous operators were forced to close the plant because of the extremely high cost of producing slab on the facilities' aging furnaces and related slab production equipment. Each company faced a prohibitive estimated capital investment cost of $200 million for replacing and upgrading such equipment. See **Exhibit 1**. Consequently, the only viable business model for restarting and sustaining operations called for out-sourcing of the slabs used to produce the flat-rolled steel products at the mill. The other alternative was for the facilities to remain idle, to the detriment of the area's steel workers.

At a cost of over $70 million, Duferco fully modernized the flat-rolling lines and upgraded other sections of the manufacturing facility. The major work involved a major upgrade to the tandem mill; installing state-of-the-art annealing furnaces; replacement of the operating system with completely integrated computer controls; adding to the mills' six finishing stands new

automatic gauge controls and increasing their drive motor power by 20 percent; installing state-of-the-art X-ray equipment to monitor dimensions; overhauling the water cooling system; replacing one of the mill's three coilers; and installing a new conveyor system and in-line automatic coil weighing and banding equipment.

The Duferco Farrell mill now has a total annual production capacity of 1.2 million metric tons of flat-rolled steel. The company produces various types of flat-rolled products, including hot-rolled bands (with and without pickling and oiling), cold-rolled sheet, and high carbon sheet and strip. The company focuses primarily on products that complement the flat-rolled production mix marketed by other U.S. producers. For example, Duferco Farrell has concentrated on products, such as hot bands, that many domestic producers have shifted away from in favor of further processed / higher value added products like corrosion-resistant steel and other downstream products. See **Exhibit 2**.

Duferco Farrell started in January 1999 with 115 employees. The company now has over 550 employees. Duferco hired many of the employees who worked at the plant under the former operators. In 2000, Duferco Farrell began to participate in an innovative program to train workers in multiple areas to generate a broad working knowledge of the operations of the mill. See **Exhibit 3**. The multi-disiplined training ensures that the current labor force can pass on the know-how and expertise over mill operations to the next generation of steel workers in the area. In 2000, Duferco Farrell received a Pennsylvania Governor's Award for Labor - Management Cooperation for having "built a solid labor-management relationship, which has led to the creation of jobs and enhanced economic development and expansion in Mercer County." See **Exhibit 4**.

II. Duferco Farrell is dependent on slabs from offshore and can continue operations only if it has access to sufficient imported quantities

The revival of the Farrell mill could not have been accomplished by retaining the aging and inefficient furnace and related equipment. The $200 million investment required for new melt and pour equipment was prohibitive. From the start of operations, the company has been reliant on third party sources for slabs. Without access to a reliable and uninterrupted supply of slabs in sufficient quantities, Duferco Farrell simply could not operate. The viability of the company depends on its access to approximately 1.3 million metric tons of steel slab on an annual basis.

Very little slab supply is made available in the merchant market by domestic mills. The primary reason for this is that integrated U.S. mills produce slab and other semifinished steel products for their own consumption in the production of downstream products. This is confirmed by AISI statistics. The domestic industry shipped only 1.1 million net tons[1] of semi-finished carbon steel in 2000, while shipping 55.9 million net tons of carbon sheet and strip, which are made from slab (along with other flat-rolled products like plate). See **Exhibit 5**. From this data, it is obvious that only a negligible share of an abundant quantity of semifinished steel products are made available in the marketplace.

Because all or nearly all domestically made slabs are consumed internally by the integrated mills who make them, there is little if any domestic supply available to non-integrated producers

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[1] The 1.1 million tons, as small as it is, is a consolidated figure that includes ingots and steel for castings as well as blooms, slabs and billets. Based on Duferco Farrell's experience, there does not appear to be any domestic slabs made available in the domestic market.

like Duferco Farrell. When the flat-rolled market is thriving, the integrated producers dedicate their semifinished output to their own flat-rolled production; at other times, when the flat-rolled segment is facing downward pricing pressure, U.S. slab producers have no incentive to add to the pressure by making slab available in the market. Further, even if supplies were available for distribution in the merchant market, U.S. slab producers would not be enthusiastic about distributing slabs to companies with whom they compete in the downstream flat-rolled market.

These circumstances prevent Duferco Farrell from purchasing slabs from U.S. producers and make the company dependent on slabs obtained offshore. If restrictions are imposed that impede access to imported slab in sufficient supplies (about 1.3 million metric tons per year), the company, not having any domestic suppliers to turn to, would simply have to close its facilities. Restricting slab imports as a means to protect the U.S. production base would, somewhat perversely, cause over 550 steel workers in Farrell to once again lose their jobs.

There is no benefit of import restrictions on semifinished steel that could begin to justify such a devastating impact on Duferco Farrell and similarly situated non-integrated mills and their workers. From publicly available sources, it does not appear that imports of semifinished steel products pose any threat to U.S. national security. In fact, semifinished steel imports appear to comprise a small and stable percentage of the semifinished steel used to make U.S. flat-rolled products. For example, as indicated in the AISI data in Exhibit 5, U.S. producer shipments of sheet and strip increased steadily from 51.6 million net tons (1998), to 55.9 million net tons (1999), to 58.3 million net tons in 2000. During the same time frame, U.S. imports of semifinished steel fluctuated from 5.6 million MT (6.1 million NT) in 1998, 7.0 million MT (7.7

million NT) in 1999 to 6.8 million MT (7.4 million NT). See import data in **Exhibit 6**. The quantity of imported semifinished steel used to make U.S. sheet and strip shipments thus increased only modestly from 11.8 percent to 12.7 percent over the last three years.[2] This marginal increase cannot possibly be undermining the U.S. production base for semifinished steel.

Further, as also reflected in the import data in Exhibit 6, nearly one-half of the total increase in U.S. semifinished steel imports from 1998 to 2000 was attributable to imports from a single country. As Russian semifinished steel is now subject to quantitative restraints, and nearly reached its allowable maximum level in 2000, imports do not pose any future security threat.

Based upon the above considerations, Duferco Farrell strongly urges that slabs be excluded from any possible relief recommended in this investigation. U.S. producers' access to offshore slabs should not be limited in any way.

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2 The foreign share of semifinished steel in U.S.-made flat-rolled products is in fact lower since the import data includes slabs used to make steel plate while the U.S. shipment data excludes steel plates.

In the event slabs are included in any recommended import measures, the tonnages should be set well above historical levels, with appropriate flexibility for preexisting contracts and short supply.

Sincerely,

Walter J. Spak
Vincent Bowen
Counsel for Duferco Farrell Corporation

EXHIBIT 1

6TH STORY of Level 1 printed in FULL format.

Pittsburgh Post-Gazette

February 20, 2000, Sunday, TWO STAR EDITION

SECTION: BUSINESS, Pg. C-1

LENGTH: 1148 words

HEADLINE: FARRELL STEEL MILL ROLLING ALONG WHERE OTHERS HAVE FAILED

BYLINE: LEN BOSELOVIC POST-GAZETTE STAFF WRITER

BODY:

Chronic mismanagement, poor investments and crippling debt have shoved this Shenango Valley steel mill to the brink of extinction more than once in recent years. The last time it turned a profit was 1987, the same year the mill, then known as Sharon Steel, filed for bankruptcy.

A new, supposedly stronger Sharon Steel emerged from bankruptcy in 1990. Two years later, the mill was bankrupt again and asking the federal government to take over its pension funds, which had $ 250 million in unfunded liabilities.

Sharon Steel rusted in peace until 1995, when Indian-born industrialist Swraj Paul bought most of the buildings and equipment for $ 26 million. He rechristened it Caparo Steel. Backed by $ 6 million in state aid, Paul set out to duplicate the turnarounds he engineered at other troubled companies. He surrendered in 1998 after three more years of losses.

In the steel industry, there's always a new investor who, when confronted with years of failure and ineptitude, thinks he can make money where others squandered it with a vengeance.

Most of the time, the investor's wrong.

Fortunately for this industrial town, though, early indications are that the latest investor may be right.

Duferco Group, a Swiss steel producer and trader, purchased much of the mill's equipment for $ 18 million in January 1999. It invested $ 50 million in the rolling mills, which flatten steel slabs into sheet that's used in construction, guard rails, saw blades and other products.

A year later, nearly 500 steel workers - many of them battle-scarred Sharon steel veterans - are working at the reconstituted mill, known as Duferco Farrell Corp.

"We'll have a profitable year here, and that's been a long time coming," says Chief Financial Officer Marcel Martin, a holdover from the Caparo days. He declined to give sales or earnings figures for the privately held company, whose fiscal year ends in September.

Steel workers who left other jobs to return don't regret their leap of faith.

"I'm glad somebody came along and saved the old girl," says Bud Williams, president of United Steelworkers Local 1016-3.

The beefy steel worker has been with the mill since 1964. There's a smile on Williams' face when he refers to himself and the other returning workers as "the last of the dinosaurs." Whatever their breed, Williams and the others know they're where they belong.

"The work force out there all think this is their home," he says.

OLD MILL, NEW TRICKS

While the cast is largely the same, Duferco's business plan isn't.

Previous owners relied on inefficient furnaces and equipment used to produce slabs, the feedstock for the rolling mills. Costs of producing the slabs were so out of line that the mill couldn't compete with more efficient steelmakers, particularly foreign producers.

Sharon Steel and Caparo tried to modernize. They pleaded unsuccessfully with lenders and investors to finance new equipment. Sharon's second stint in bankruptcy came after the state teachers' pension fund balked at investing $ 30 million in the moribund mill.

Duferco didn't buy Caparo's inefficient furnaces and related equipment. Nor did it invest hundreds of million of dollars in new equipment. Instead, the experienced steel trader is buying slabs from Russia, Brazil, Argentina and other countries. The slabs are imported to Philadelphia and shipped by rail to Farrell.

Analysts say importing slabs makes economic sense, and they expect other domestic companies to copy Duferco's plan.

However, there were risks. Unionized steelworkers have been the foot soldiers of the "Stand Up for Steel" campaign launched by domestic steel producers and the USW after imports surged in mid1998. How would union members feel about working for a slab importer after marching on Washington over imports?

"In this circumstance, we have no choice," says USW staff representative Peter Eritano. "What are you going to do? You can't walk away from the place."

New rolls, new rules

Putting $ 50 million into the rolling mills was a much cheaper proposition than installing new furnaces and a caster to produce slabs. A mill's "hot end," where scrap or iron ore is melted in huge furnaces to produce steel, is the most expensive part of a steel plant. It also poses more environmental liabilities than rolling someone else's slabs.

Importing slabs isn't Duferco's only advantage. Unlike other cashstrapped steelmakers who must plead with bankers for the privilege of borrowing at junk-bond rates, Duferco used its own cash to finance most of the improvements.

"It would not have worked without Duferco's leadership, Duferco's reputation, Duferco's capital," says Human Resources Manager Mike Hrycyk, a holdover from Sharon Steel and Caparo.

Hrycyk was the first person Duferco hired when it took over. His job was to negotiate a five-year labor agreement with the union that would provide some stability to the mill and its customers.

"There were a lot of credibility issues that had to be addressed," Hrycyk says.

Workers knew little about Duferco, and they had to be convinced that its plan made sense. It helped that Hrycyk and other seasoned veterans returned. So did the fact that Hrycyk golfs and bowls with Williams, the union president.

"We disagree on things that are just honest disagreements, not traditional labor-management issues," Hrycyk says.

The contract includes a simplified pay scale, flexible work rules and health, dental and vision benefits. Williams says every hourly worker is making just as much or more than before they returned to the mill. When a 50-cent-an-hour increase takes effect in April, the lowest-paid steelworker will make $ 11.90 an hour.

Going home again

Fred Bartel returned to the mill because his boss assured him Duferco's plan would work. Bartel, 52, has worked at the mill since 1969. The third-generation steelworker operates the roughing mill, which pounds 10-inch thick slabs down to 1 1/4 inches.

"You can see a lot more things getting done, and it's an atmosphere where it's a whole lot more comfortable to work in," Bartel says. "There's a future here. You just feel it."

One of the biggest improvements Leroy Woods noticed was the ability to get spare parts quickly. Under Sharon Steel, an equipment problem usually meant a prolonged shutdown and a desperate scramble for a replacement part.

"You just can't believe what we had to work with before and what we have now. It's like night and day," says Woods, who operates a rolling mill.

Woods' boss, 43-year-old Jeff Garrett, spent 10 years at Sharon Steel, then left to work as a registered nurse when Caparo took over. He says working for Duferco has been like coming home. Only this time, the home is run by smarter, richer parents.

"It's very exciting to come back and make something that fell get up again," Garrett says.

GRAPHIC: PHOTO 4, PHOTO: Tony Tye/Post-Gazette Photos: (For two photos) Durferco; Farrell Corp. operates in part of the old Sharon Steel plant in Farrell.; Durferco moved there early last year and now employs about 500. Above, Leroy; Woods operates a rolling mill by using a computer. Top, an inside view

of the; mill.; PHOTO: Bud Williams, United Steelworkers Local 1016-3 president, has worked; under various owners and company names since 1964.; PHOTO: Roughing mill operator Fred Bartel works in one of the control rooms; for the Duferco Farrell Corp.

LOAD-DATE: February 24, 2000

EXHIBIT 2

6TH STORY of Level 1 printed in FULL format.

Iron Age New Steel

May 1999

SECTION: Vol. 15, No. 5 Pg. 10-11; ISSN: 0897-4365; CODEN: GVEXAW

LENGTH: 458 words

HEADLINE: Duferco upgrades former Caparo mill

BODY:

Since purchasing Caparo Steel's facility in Farrell, Pa., on Jan. 1st, the Duferco Group has spent about $ 20 million modernizing the facility and is focused on supplying hot bands.

The plant now operates under the name Duferco Farrell Corp. It expected to complete the first phase of a two-phase modernization by the end of April. The company was running on schedule with two weeks to spare in the project, says Tom Cullen, president of Duferco Farrell.

In the upgrade, Duferco Farrell is adding hydraulic gage controls to all the finishing stands, upgrading the spray-water-cooling system for the hot-strip mill, and installing a computer-control system. The company also plans to replace the conveyor system and one of the mill's downcoilers.

The hot-strip mill will have a capacity of 900,000-1 million tons per year. Duferco Farrell hopes to reach capacity by the fourth quarter.

Plans haven't been finalized for the second phase, Cullen says. But they will entail revamping a pickling line and a five-stand tandem cold mill.

"We want to ensure that the quality of our product is competitive quality-wise with the major integrateds and the minimills," Cullen says.

Caparo hadn't produced steel at the plant in more than a year before Duferco acquired it, Cullen says. Caparo purchased the mill in 1994 for $ 26 million. Terms of the most recent transaction weren't disclosed.

The steel mill no longer produces its own liquid metal. When Duferco took over operations, Caparo already had shut down the melting operations. Duferco doesn't plan to restart them. Duferco Farrell purchases slabs from suppliers in Russia, Brazil, and Argentina.

Duferco Farrell expects to focus on supplying hot bands because so many other domestic producers have shifted their focus to coldrolled and other downstream products. "That leaves a good opportunity for a supplier that is responsive to customers' needs and produces a quality product," Cullen says. "We have a lot of customers over the years that have complained about their hot-rolled suppliers becoming too interested in cold-rolled and galvanized."

But Duferco Farrell intends to start up some additional downstream production. The company will send some of its products to the cold mill after it's upgraded.

Duferco Farrell also plans to increase production at a Sendzimir mill that can process products such as heavy plate with tighter tolerances. The Sendzimir mill can process up to 120,000 tons/ year; it was operating at about 50-percent capacity in April.

Duferco, a nearly $ 3 billion/year Swiss company, operates trading and servicecenter distribution businesses in the U.S. But little of Duferco Farrell's products will target those businesses, Cullen says.

JOURNAL-CODE: IAM

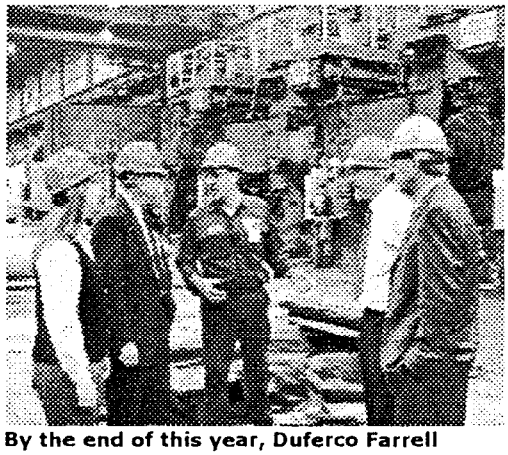
ABI-ACC-NO: 01822289

LOAD-DATE: May 27, 1999

EXHIBIT 3

The Business Journal Online MidSeptember 2000

Poised for Expansion: Duferco Upgrades Furnaces, Adds Jobs



By the end of this year, Duferco Farrell Corp. projects employment of 600. Shown from left are Diane Marinoff, human resources training coordinator; G. Warren Smith, president of Slippery Rock University; Guy Schell, president of United Steelworkers of America Local 1016-3; Michael Hrycyk, manager of human resources; and Fred Baer, coordinator of the Workforce and Economic Development Network of Pennsylvania.

By Dan O'Brien

How do you resurrect an aging steel mill, revamp its operation and bring it into profitability - all within two years?

First, invest $100 million. Second, embark on a long-term goal to train and educate a work force confronted with new challenges in a highly competitive world market.

Only a year and a half after it purchased bankrupt Caparo Steel, Duferco Farrell Corp., Farrell, Pa., has not only committed $100 million to acquire and modernize the old mill, it has a work force of some 550. By year's end, company officials project that number will grow to 600.

"The theme is that we're not standing still," says Bill Jacob, Duferco's executive vice president. When Duferco bought the company Jan. 1, 1999, it had 115 workers. Since then, the company has stepped up modernization efforts at the plant while phasing in new personnel. In December, Duferco Farrell installed a new, $12 million world-class tandem mill, and is completing a $13 million upgrade of its annealing furnaces, says Michael Hrycyk, manager of human resources.

The tandem mill upgrade, originally planned for this year, was put into production ahead of schedule to take advantage of what was then a robust market.

"In March, we shipped 111,000 tons of steel," Hrycyk notes. The market has since softened because of higher interest rates and a flood of foreign cold-rolled steel entering the U.S. market. Duferco is shipping some 90,000 tons a month, he reports.

Despite adverse markets, Duferco has not wavered from planned upgrades in the company's hot mill, Jacob adds.

Duferco Farrell is a subsidiary of Duferco, a corporation based in Lugano, Switzerland. Unlike its predecessor, Caparo Steel, Duferco Farrell does not operate a melt shop. Instead, the mill takes advantage of the parent company's worldwide trading operations by purchasing steel slabs from the foreign market and processing them in America.

This may soon change now that Duferco Farrell has issued a letter of intent seeking to acquire a melting operation owned by Sysco Steel in Sydney, Nova Scotia, Hrycyk states. The melt shop would give the company the ability to melt scrap steel, convert it into slabs and ship it to Duferco's processing plant in Farrell, thereby cutting delivery time to four weeks. Although the company keeps an inventory of 300,000 tons of steel slabs in Philadelphia, it can sometimes take five months to fill an order.

The Canadian operation would supply 50 percent of the slabs processed at Duferco Farrell, says Vice President Jacob. "If 50 percent can be produced on a short lead-time basis, we can serve our customers better and increase our flexibility," he says. More important, he adds, these efforts reinforce the company's commitment to the facility and the region.

To ensure a smooth transition with the numerous upgrades, Duferco recently initiated an ambitious training program for its employees, Hrycyk says. The idea is to train workers in a variety of capacities so they can develop a broad working knowledge of the mill's operations. To help this process, Duferco received $101,285 from Workforce and Economic Development Network of Pennsylvania (WEDnetPA), a state organization that partially reimburses technology and manufacturing-based businesses for employee training.

"This is exactly what this program is designed to do -- to help a company like this get their staff up to where they need to be," says Fred M. Baer, coordinator for WEDnetPA.

Duferco heard about the program through Slippery Rock University, which acted as a intermediary between the company and the state. "It's far from covering all the costs, but it helps," Hrycyk says.

Perhaps the greatest challenges confronting the region's manufacturing sector is the shortage of qualified workers, says G. Warren Smith, president of Slippery Rock University. By becoming partners with WEDnetPA, the university can contribute to work force development in the state, Smith observes. "We're looking to form a partnership that can last throughout a person's career," he notes.

Guy Schell, president of Local 1016-3 of United Steelworkers of America, says workers are very receptive to the training regimen, and Duferco has established a productive relationship with the union. "It seems like they're really going to make it. This is a whole different work force," he says.

Union employees are very receptive to learning the new operations, Schell adds. "There's multi-craft training throughout the industry," he says.

Plant employees earn between $13.20 and $17.20 an hour, says Hrycyk, and the union is on the verge of signing a profit-sharing agreement with the company. Average work attendance is also impressive, he states. "Our work attendance rate is 99.5 percent every day -- that speaks for itself."

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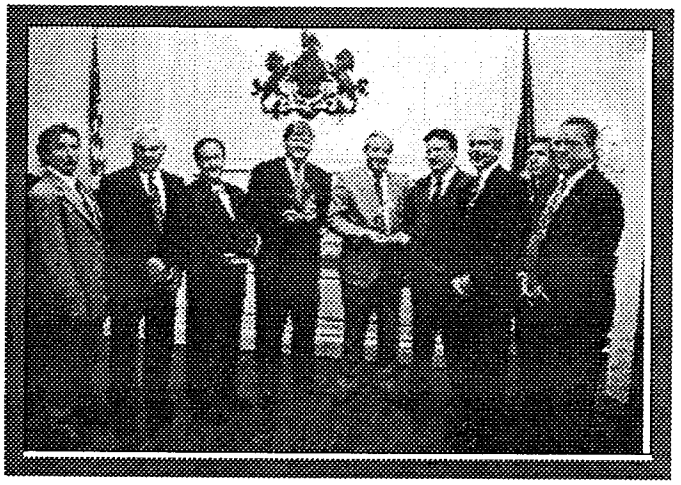
Pennsylvania Department of Labor & Industry

Governor's Award for Labor-Management Cooperation



Duferco Farrell Corporation

United Steelworkers of America Local 1016-3

Mercer County Building Trades Council

Duferco Farrell Corp. and USWA Local 1016-3 have built a solid labor-management relationship, which has lead to the creation of jobs, and enhanced economic development and expansion in Mercer County. Durferco and USWA 1016-3 are in the midst of a five-year labor agreement that was inked in January 1999. Union and management have an open-door policy, and the two routinely discuss issues. Monthly meetings are held to discuss concerns. The cooperative relationship at Duferco has allowed the company to invest $50 million to computerize its "cold-roll" mill and upgrade other sections of the manufacturing facility. The construction and renovations created jobs for hundreds of union building crafts. Through the cooperative agreement with the Mercer County Building Trades, all renovations were completed on time, a requirement essential for a steel operation. Duferco, Local 1016-3, and the Mercer County Building Trades Council are members of the Northwest PA Cooperation Council.

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Pennsylvania Department of Labor & Industry

Governor's Award for Labor-Management Cooperation

2000 Recipients

Duferco Farrell Corporation
United Steelworkers of America Local 1016-3
Mercer County Building Trades Council

Erie Construction Council, Inc.
Great Lakes Building Trades Council

L. E. Smith Glass Company
American Flint Glass Workers Locals 102 and 537

Philadelphia Newspapers Inc.
The Council of Newspapers Unions
Communication Workers of America Local 14826
Graphic Communications Int'l Union Local 14
International Association of Machinists District Lodge 1, Local Union 447
International Brotherhood of Teamsters Locals 169, 628, and 676
Newspaper & Magazine Employees Union Local 1414
Newspaper Guild of Greater Philadelphia Local 10
Philadelphia Newspaper Union Local 16
Philadelphia Newspapers Inc. Security Union
Philadelphia Porters Independent Union

Port Authority of Allegheny County
Amalgamated Transit Local 85
International Brotherhood of Electrical Workers Local 29
Port Authority Police Association

Scranton State School for the Deaf
Scranton State School for the Deaf Education Association

Sharon City School District
Sharon Teachers Association

Sharon Tube Company
Steelworkers of America Local 1355

Sharpsville Area School District
American Federation of State, County and Municipal Employees Local 633

Wilkes-Barre Area School District

AMERICAN IRON AND STEEL INSTITUTE
1101 17th Street, N.W., Suite 1300
WASHINGTON, D.C. 20036

EXHIBIT 5

NET SHIPMENTS OF STEEL MILL PRODUCTS

ALL GRADES INCLUDING CARBON, ALLOY AND STAINLESS

NET TONS

PRELIMINARY

DECEMBER 1998

Products	CODE	CURRENT MONTH CARBON	ALLOY	STAINLESS	TOTAL	PERCENT 1998	PERCENT 1997	YEAR-TO-DATE CARBON	ALLOY	STAINLESS	TOTAL	PERCENT 1998	PERCENT 1997	PERCENT CHANGE
Ingots and Steel for Castings	1A	2,601	8,809	17	11,427	0.2%	0.1%	43,040	109,295	972	153,307	0.2%	0.2%	-8.2%
Blooms,Slabs,Billets	1B	99,280	22,265	1,314	122,859	1.7%	2.4%	1,346,466	516,070	20,533	1,883,069	1.8%	2.3%	-23.2%
Total Semi-Finished		101,881	31,074	1,331	134,286	1.8%	2.5%	1,389,506	625,365	21,505	2,036,376	2.0%	2.5%	-22.2%
Wire Rods	3	350,979	9,966	2,063	363,008	4.9%	4.6%	4,959,815	148,713	31,924	5,140,452	5.0%	5.0%	-3.2%
Structural Shapes(3" & over)	4***	399,155			399,155	5.4%	5.4%	5,131,410			5,131,410	5.0%	5.4%	-9.5%
Steel Piling	5**	25,842			25,842	0.4%	0.3%	320,732			320,732	0.3%	0.3%	-10.1%
Plates - Cut Lengths	6A	308,329	36,006	8,743	353,078	4.8%	5.4%	4,947,141	506,099	127,326	5,580,566	5.5%	5.1%	2.9%
Plates - In Coils	6B	160,573	19	8,672	169,264	2.3%	3.3%	3,160,940	8,134	115,854	3,284,928	3.2%	3.2%	-4.2%
Total Shapes and Plates		893,899	36,025	17,415	947,339	12.9%	14.4%	13,560,223	514,233	243,180	14,317,636	14.0%	14.1%	-3.8%
Rails-Standard (over 60 lb)	7	66,751			66,751	0.9%	0.7%	781,236			781,236	0.8%	0.7%	7.2%
-All Other	8					0.0%	0.0%					0.0%	0.0%	
Railroad Accessories	9	6,000			6,000	0.1%	0.1%	99,800			99,800	0.1%	0.1%	-30.5%
Total Rails and Accessories		72,751			72,751	1.0%	0.8%	881,036			881,036	0.9%	0.8%	0.7%
Bars-Hot Rolled	14	375,579	109,222	1,893	486,694	6.6%	7.5%	5,659,678	2,149,958	25,091	7,834,727	7.7%	7.7%	-3.9%
-Bar-Size Light Shapes	14A	174,046	(Incl. Hot Rolled Bars)		174,046	2.4%	2.4%	2,462,974	(Incl. Hot Rolled Bars)		2,462,974	2.4%	2.4%	-3.7%
-Reinforcing	15	485,095			485,095	6.6%	5.5%	6,285,907			6,285,907	6.2%	5.8%	1.6%
-Cold Finished	16	84,450	24,814	7,727	116,991	1.6%	1.6%	1,332,898	305,302	130,192	1,768,392	1.7%	1.7%	-2.3%
Total Bars		1,119,170	134,036	9,620	1,262,826	17.2%	17.0%	15,741,457	2,455,260	155,283	18,352,000	18.0%	17.7%	-1.9%
Tool Steel	17		3,374		3,374	0.0%	0.0%		51,456		51,456	0.1%	0.1%	-18.9%
Standard Pipe	18***	96,591			96,591	1.3%	1.5%	1,344,352			1,344,352	1.3%	1.4%	-12.2%
Oil Country Goods	19	26,382	21,554		47,936	0.7%	2.0%	700,241	635,879		1,336,120	1.3%	2.1%	-38.9%
Line Pipe	20***	81,897			81,897	1.1%	1.5%	1,389,196			1,389,196	1.4%	1.3%	-0.7%
Mechanical Tubing	21A	44,377	19,296		63,673	0.9%	1.0%	732,052	362,625		1,094,677	1.1%	1.1%	-6.1%
Pressure Tubing	21B	1,996	1,063		3,059	0.0%	0.0%	28,576	10,442		39,018	0.0%	0.0%	-0.4%
Structural Pipe and Tubing	22A	5,294			5,294	0.1%	0.1%	113,581			113,581	0.1%	0.1%	-19.4%
Pipe for Piling	22B	11,814			11,814	0.2%	0.1%	64,279			64,279	0.1%	0.0%	32.5%
Stainless Pipe and Tubing	21C&D			2,044	2,044	0.0%	0.0%			28,517	28,517	0.0%	0.0%	-14.1%
Total Pipe and Tubing		268,351	41,913	2,044	312,308	4.2%	6.3%	4,372,277	1,008,946	28,517	5,409,740	5.3%	6.2%	-17.4%
Wire-Drawn and/or Rolled	23	36,234	6,037	1,816	44,087	0.6%	0.4%	588,566	41,654	24,653	654,873	0.6%	0.6%	5.8%
Black Plate	28	21,047			21,047	0.3%	0.3%	248,885			248,885	0.2%	0.3%	-23.7%
Tin Plate	29	183,151			183,151	2.5%	2.9%	2,554,444			2,554,444	2.5%	2.6%	-6.4%
Tin Free Steel	29A	60,553			60,553	0.8%	0.9%	812,626			812,626	0.8%	0.9%	-10.8%
Tin Coated Sheets	30	5,626			5,626	0.1%	0.1%	98,116			98,116	0.1%	0.1%	8.4%
Total Tin Mill Products		270,377			270,377	3.7%	4.2%	3,714,071			3,714,071	3.6%	3.8%	-8.5%
Sheets-Hot Rolled	31	1,201,024	24,422	4,798	1,230,244	16.7%	17.8%	15,303,350	325,793	99,085	15,728,228	15.4%	17.2%	-13.7%
-Cold Rolled	32***	886,535		79,291	965,826	13.1%	13.0%	12,244,742		947,782	13,192,524	12.9%	12.6%	-1.0%
Sheets & Strip Galv.(Hot Dipped)	33A	1,029,871			1,029,871	14.0%	11.7%	13,481,438			13,481,438	13.2%	11.8%	8.4%
-Galvanized (Electrolytic)	33B	293,393			293,393	4.0%	3.4%	3,742,568			3,742,568	3.7%	3.6%	-1.8%
-All Other Metallic Coated	34	168,999			168,999	2.3%	1.8%	2,156,477			2,156,477	2.1%	1.9%	5.3%
Electrical Sheets and Strip	35	10,423	30,995		41,418	0.6%	0.5%	116,132	471,172		587,304	0.6%	0.5%	15.2%
Strip-Hot Rolled	36***	66,997		925	67,922	0.9%	0.8%	880,853		13,512	894,365	0.9%	0.8%	10.0%
-Cold Rolled	37	98,717	9,743	43,484	151,944	2.1%	0.8%	1,192,600	126,049	484,063	1,802,712	1.8%	1.0%	78.7%
Total Sheets and Strip		3,755,959	65,160	128,498	3,949,617	53.7%	49.8%	49,118,160	923,014	1,544,442	51,585,616	50.5%	49.3%	-1.1%
TOTAL SHIPMENTS 1998		6,869,601	327,585	162,787	7,359,973	100.0%	XXX	94,325,111	5,768,641	2,049,504	102,143,256	100.0%	XXX	-3.5%
Total Shipments - Prior Year 1997		7,944,123	552,314	151,452	8,647,889	XXX	100.0%	97,509,152	6,281,898	2,066,964	105,858,014	XXX	100.0%	XXX

*Includes revisions for previous months. **Includes Sheet Piling - current month YTD ***Some Alloy included in Carbon due to disclosure.

2/5/99

AMERICAN IRON AND STEEL INSTITUTE
1101 17th Street, N.W., Suite 1300
WASHINGTON, D.C. 20036

NET SHIPMENTS OF STEEL MILL PRODUCTS
ALL GRADES INCLUDING CARBON, ALLOY AND STAINLESS
NET TONS

AIS 10
PRELIMINARY
DECEMBER 1999

Products	CODE	CURRENT MONTH CARBON	ALLOY	STAINLESS	TOTAL	PERCENT 1999	PERCENT 1998	YEAR-TO-DATE CARBON	ALLOY	STAINLESS	TOTAL	PERCENT 1999	PERCENT 1998	PERCENT CHANGE
Ingots and Steel for Castings	1A	647	3,611	25	4,283	0.0%	0.2%	22,837	78,081	652	101,570	0.1%	0.1%	-32.3%
Blooms,Slabs,Billets	1B	57,239	7,844	19,889	84,972	0.9%	1.7%	1,062,660	246,197	70,764	1,379,621	1.3%	1.9%	-29.0%
Total Semi-Finished		57,886	11,455	19,914	89,255	1.0%	1.8%	1,085,497	324,278	71,416	1,481,191	1.4%	2.0%	-29.3%
Wire Rods	3	402,524	9,837	2,385	414,746	4.5%	4.9%	4,959,762	146,697	31,827	5,138,286	4.9%	5.0%	0.3%
Structural Shapes(3" & over)	4***	549,748			549,748	6.0%	5.4%	5,595,041			5,595,041	5.3%	5.1%	6.1%
Steel Piling	5**	56,307			56,307	0.6%	0.4%	400,189			400,189	0.4%	0.3%	24.8%
Plates - Cut Lengths	6A	370,576	35,019	7,726	413,321	4.5%	4.8%	4,445,907	451,628	93,838	4,991,373	4.7%	5.4%	-10.6%
Plates - In Coils	6B	284,626		12,598	297,224	3.2%	2.3%	3,090,498		118,348	3,208,846	3.1%	3.2%	-2.3%
Total Shapes and Plates		1,261,257	35,019	20,324	1,316,600	14.4%	12.9%	13,531,635	451,628	212,186	14,195,449	13.5%	14.1%	-1.8%
Rails-Standard (over 60 lb)	7	45,937			45,937	0.5%	0.9%	501,432			501,432	0.5%	0.8%	-35.8%
-All Other	8					0.0%	0.0%					0.0%	0.0%	
Railroad Accessories	9	12,000			12,000	0.1%	0.1%	144,400			144,400	0.1%	0.2%	-6.0%
Total Rails and Accessories		57,937			57,937	0.6%	1.0%	645,832			645,832	0.6%	0.9%	-31.1%
Bars-Hot Rolled	14	517,570	172,018	2,429	692,017	7.6%	6.6%	6,051,744	2,002,593	24,074	8,078,411	7.7%	8.0%	-1.4%
-Bar-Size Light Shapes	14A	216,795	(Incl. Hot Rolled Bars)		216,795	2.4%	2.4%	2,449,833	(Incl. Hot Rolled Bars)		2,449,833	2.3%	2.4%	-1.1%
-Reinforcing	15	491,202			491,202	5.4%	6.6%	6,183,164			6,183,164	5.9%	5.8%	4.6%
-Cold Finished	16	95,710	27,237	10,389	133,336	1.5%	1.6%	1,327,455	325,904	121,786	1,775,145	1.7%	1.7%	-0.3%
Total Bars		1,321,277	199,255	12,818	1,533,350	16.7%	17.2%	16,012,196	2,328,497	145,860	18,486,553	17.6%	17.9%	0.7%
Tool Steel	17		3,888		3,888	0.0%	0.0%		52,522		52,522	0.0%	0.1%	2.1%
Standard Pipe	18***	105,225			105,225	1.1%	1.3%	1,252,088			1,252,088	1.2%	1.3%	-6.9%
Oil Country Goods	19	78,022	49,446		127,468	1.4%	0.7%	560,047	423,006		983,053	0.9%	1.3%	-26.4%
Line Pipe	20***	72,655			72,655	0.8%	1.1%	1,349,834			1,349,834	1.3%	1.4%	-2.8%
Mechanical Tubing	21A	50,180	26,756		76,936	0.8%	0.9%	616,542	359,105		975,647	0.9%	1.1%	-10.9%
Pressure Tubing	21B	2,059	288		2,347	0.0%	0.0%	19,000	3,462		22,462	0.0%	0.0%	-42.4%
Structural Pipe and Tubing	22A	13,212			13,212	0.1%	0.1%	118,889			118,889	0.1%	0.1%	4.7%
Pipe for Piling	22B	3,830			3,830	0.0%	0.2%	49,070			49,070	0.0%	0.1%	-23.7%
Stainless Pipe and Tubing	21C&D			1,654	1,654	0.0%	0.0%			21,340	21,340	0.0%	0.0%	-24.8%
Total Pipe and Tubing		325,183	76,490	1,654	403,327	4.4%	4.2%	3,965,470	785,573	21,340	4,772,383	4.5%	5.3%	-11.8%
Wire-Drawn and/or Rolled	23	32,768	8,107	1,374	42,249	0.5%	0.6%	494,268	97,732	19,472	611,472	0.6%	0.7%	-15.6%
Black Plate	28	23,379			23,379	0.3%	0.3%	232,483			232,483	0.2%	0.2%	-6.6%
Tin Plate	29	208,061			208,061	2.3%	2.5%	2,615,757			2,615,757	2.5%	2.5%	2.4%
Tin Free Steel	29A	66,672			66,672	0.7%	0.8%	823,576			823,576	0.8%	0.8%	1.3%
Tin Coated Sheets	30	7,580			7,580	0.1%	0.1%	99,003			99,003	0.1%	0.1%	0.9%
Total Tin Mill Products		305,692			305,692	3.3%	3.7%	3,770,819			3,770,819	3.6%	3.6%	1.5%
Sheets-Hot Rolled	31	1,669,162	22,506	7,686	1,699,354	18.6%	16.7%	17,345,444	295,449	99,547	17,740,440	16.9%	15.3%	12.9%
-Cold Rolled	32***	1,197,591		94,143	1,291,734	14.1%	13.1%	12,909,839		963,899	13,873,738	13.2%	12.9%	5.2%
Sheets & Strip Galv.(Hot Dipped)	33A	1,217,186			1,217,186	13.3%	14.0%	14,869,847			14,869,847	14.1%	13.2%	10.3%
-Galvanized (Electrolytic)	33B	287,259			287,259	3.1%	4.0%	3,767,727			3,767,727	3.6%	3.7%	0.7%
-All Other Metallic Coated	34	185,740			185,740	2.0%	2.3%	2,100,007			2,100,007	2.0%	2.1%	-2.6%
Electrical Sheets and Strip	35	5,298	39,237		44,535	0.5%	0.6%	82,832	479,137		561,969	0.5%	0.6%	-4.3%
Strip-Hot Rolled	36***	88,223		3,568	91,791	1.0%	0.9%	953,208		28,006	981,214	0.9%	0.9%	9.8%
-Cold Rolled	37	117,637	11,765	45,298	174,700	1.9%	2.1%	1,378,587	142,436	532,867	2,053,890	2.0%	1.7%	14.8%
Total Sheets and Strip		4,768,096	73,508	150,695	4,992,299	54.5%	53.7%	53,407,491	917,022	1,624,319	55,948,832	53.2%	50.3%	8.5%
TOTAL SHIPMENTS 1999		8,532,620	417,559	209,164	9,159,343	100.0%	XXX	97,872,970	5,103,949	2,126,420	105,103,339	100.0%	XXX	2.6%
Total Shipments - Prior Year 1998		6,869,601	327,585	162,787	7,359,973	XXX	100.0%	94,535,511	5,846,713	2,037,326	102,419,550	XXX	100.0%	XXX

*Includes revisions for previous months. **Includes Sheet Piling - current month YTD ***Some Alloy included in Carbon due to disclosure.

2/9/00

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NET SHIPMENTS OF STEEL MILL PRODUCTS
ALL GRADES INCLUDING CARBON, ALLOY AND STAINLESS
NET TONS

AIS 10
PRELIMINARY
DECEMBER 2000

Products	CODE	CURRENT MONTH CARBON	ALLOY	STAINLESS	TOTAL	PERCENT 2000	PERCENT 1999	YEAR-TO-DATE CARBON	ALLOY	STAINLESS	TOTAL	PERCENT 2000	PERCENT 1999	PERCENT CHANGE
Ingots and Steel for Castings	1A	631	13,667	148	14,446	0.2%	0.0%	11,880	128,061	523	140,464	0.1%	0.2%	-17.8%
Blooms,Slabs,Billets	1B	79,126	7,922	244	87,292	1.2%	0.9%	1,063,749	131,177	7,984	1,202,910 *	1.1%	0.9%	25.7% →
Total Semi-Finished		79,757	21,589	392	101,738	1.3%	1.0%	1,075,629 *	259,238	8,507	1,343,374	1.2%	1.1%	19.1%
Wire Rods	3	300,247	9,508	1,761	311,516	4.1%	4.5%	4,743,863	137,337	28,650	4,909,850	4.5%	4.9%	-6.3%
Structural Shapes(3" & over)	4**	532,159			532,159	7.0%	6.0%	7,402,216			7,402,216	6.8%	5.4%	29.1%
Steel Piling	5					0.0%	0.6%	230			230	0.0%	0.4%	-99.9%
Plates - Cut Lengths	6A	297,121	18,324	8,284	323,729	4.3%	4.5%	5,025,501	473,763	108,239	5,607,503	5.1%	4.7%	12.3%
Plates - In Coils	6B	182,539		5,552	188,091	2.5%	3.2%	3,192,452		97,744	3,290,196	3.0%	3.0%	2.5%
Total Shapes and Plates		1,011,819	18,324	13,836	1,043,979	13.8%	14.4%	15,620,399	473,763	205,983	16,300,145	14.9%	13.5%	13.7%
Rails-Standard (over 60 lb)	7	63,855			63,855	0.8%	0.5%	654,481			654,481	0.6%	0.5%	30.5%
-All Other	8					0.0%	0.0%					0.0%	0.0%	
Railroad Accessories	9	9,000			9,000	0.1%	0.1%	128,300			128,300	0.1%	0.1%	-3.3%
Total Rails and Accessories		72,855			72,855	1.0%	0.6%	782,781			782,781	0.7%	0.6%	23.4%
Bars-Hot Rolled	14	388,198	136,776	1,745	526,719	7.0%	7.6%	5,744,577	2,131,674	24,382	7,900,633	7.2%	7.4%	0.0%
-Bar-Size Light Shapes	14A	125,710	(Incl. Hot Rolled Bars)		125,710	1.7%	2.4%	1,661,525	(Incl. Hot Rolled Bars)		1,661,525	1.5%	2.2%	-29.7%
-Reinforcing	15	538,894			538,894	7.1%	5.4%	6,892,988			6,892,988	6.3%	6.2%	5.3%
-Cold Finished	16	81,203	16,491	9,838	107,532	1.4%	1.5%	1,329,192	291,741	135,532	1,756,465	1.6%	1.7%	-2.6%
Total Bars		1,134,005	153,267	11,583	1,298,855	17.2%	16.7%	15,628,282	2,423,415	159,914	18,211,611	16.6%	17.5%	-2.1%
Tool Steel	17		2,708		2,708	0.0%	0.0%		45,442		45,442	0.0%	0.0%	-13.5%
Standard Pipe	18**	82,399			82,399	1.1%	1.1%	1,333,651			1,333,651	1.2%	1.2%	6.5%
Oil Country Goods	19	85,236	74,220		159,456	2.1%	1.4%	1,016,055	774,725		1,790,780	1.6%	0.9%	81.5%
Line Pipe	20**	86,040			86,040	1.1%	0.8%	975,988			975,988	0.9%	1.3%	-27.9%
Mechanical Tubing	21A	39,223	23,249		62,472	0.8%	0.8%	649,088	391,277		1,040,365	0.9%	0.9%	6.6%
Pressure Tubing	21B	2,052	522		2,574	0.0%	0.0%	32,269	4,979		37,248	0.0%	0.0%	65.8%
Structural Pipe and Tubing	22A	6,853			6,853	0.1%	0.1%	149,657			149,657	0.1%	0.1%	26.1%
Pipe for Piling	22B	1,424			1,424	0.0%	0.0%	40,484			40,484	0.0%	0.0%	-17.5%
Stainless Pipe and Tubing	21C&D			1,087	1,087	0.0%	0.0%			16,889	16,889	0.0%	0.0%	-20.9%
Total Pipe and Tubing		303,227	97,991	1,087	402,305	5.3%	4.4%	4,197,192	1,170,981	16,889	5,385,062	4.9%	4.5%	12.7%
Wire-Drawn and/or Rolled	23	30,715	6,178	1,050	37,943	0.5%	0.5%	479,581	82,851	17,040	579,472	0.5%	0.6%	-9.2%
Black Plate	28	13,946			13,946	0.2%	0.3%	313,535			313,535	0.3%	0.2%	34.9%
Tin Plate	29	178,252			178,252	2.4%	2.3%	2,523,155			2,523,155	2.3%	2.5%	-3.5%
Tin Free Steel	29A	51,481			51,481	0.7%	0.7%	814,585			814,585	0.7%	0.8%	-1.1%
Tin Coated Sheets	30	6,210			6,210	0.1%	0.1%	90,351			90,351	0.1%	0.1%	-8.7%
Total Tin Mill Products		249,889			249,889	3.3%	3.3%	3,741,626			3,741,626	3.4%	3.6%	-0.8%
Sheets-Hot Rolled	31	1,428,068	5,204	8,375	1,441,647	19.1%	18.6%	19,042,182	119,629	74,264	19,236,075	17.5%	17.6%	2.9%
-Cold Rolled	32**	965,604		76,880	1,042,484	13.8%	14.1%	13,762,458		1,039,555	14,802,013	13.5%	13.2%	5.8%
Sheets & Strip Galv.(Hot Dipped)	33A	936,177			936,177	12.4%	13.3%	14,916,833			14,916,833	13.6%	14.0%	0.3%
-Galvanized (Electrolytic)	33B	205,831			205,831	2.7%	3.1%	3,496,134			3,496,134	3.2%	3.5%	-7.2%
-All Other Metallic Coated	34	137,478			137,478	1.8%	2.0%	2,138,462			2,138,462	2.0%	2.0%	1.8%
Electrical Sheets and Strip	35	628	34,649		35,277	0.5%	0.5%	20,061	508,153		528,214	0.5%	0.5%	-6.0%
Strip-Hot Rolled	36**	57,456		537	57,993	0.8%	1.0%	844,061		19,522	863,583	0.8%	0.9%	-12.0%
-Cold Rolled	37	131,082	12,487	36,555	180,124	2.4%	1.9%	1,651,410	158,080	533,368	2,342,858	2.1%	1.9%	14.3%
Total Sheets and Strip		3,862,324	52,340	122,347	4,037,011	53.4%	54.5%	55,871,601 *	785,862	1,666,709	58,324,172 *	53.2%	53.7%	2.3%
TOTAL SHIPMENTS 2000		7,044,838	361,905	152,056	7,558,799	100.0%	XXX	102,140,954	5,378,889	2,103,692	109,623,535	100.0%	XXX	3.2%
Total Shipments - Prior Year 1999		8,532,620	417,559	209,164	9,159,343	XXX	100.0%	98,693,881	5,420,669	2,086,495	106,201,045	XXX	100.0%	XXX

*Includes revisions for previous months.

**Some Alloy included in Carbon due to disclosure.

2/5/01

EXHIBIT 6

U.S. Imports for Consumption, Commodity: 7207

Data	V_1997	V_1998	V_1999	V_2000	Q_1997	Q_1998	Q_1999	Q_2000	$US/KG1997	$US/KG1998	$US/KG1999	$US/KG2000
Grand Total	1,393,751,128	1,331,822,996	1,279,201,983	1,497,891,799	5,414,114,987	5,589,015,472	7,043,222,908	6,766,545,138	0.26	0.24	0.18	0.22
BRAZIL	452,115,059	378,369,346	430,750,141	488,155,718	1,798,795,272	1,604,179,400	2,492,111,919	2,200,183,789	0.25	0.24	0.17	0.22
MEXICO	333,711,861	342,067,715	296,316,346	346,460,330	1,278,948,309	1,434,252,845	1,596,664,250	1,454,063,934	0.26	0.24	0.19	0.24
RUSSIA	77,032,244	61,390,776	92,117,084	157,348,326	334,249,179	280,348,502	499,123,172	722,750,156	0.23	0.22	0.18	0.22
UKRAINE	21,620,673	74,079,292	47,699,932	115,039,729	94,609,149	319,720,325	330,649,258	608,392,571	0.23	0.23	0.14	0.19
AUSTRAL	76,266,814	163,403,051	85,861,181	83,066,685	280,246,017	696,963,963	539,170,515	402,817,709	0.27	0.23	0.16	0.21
JAPAN	12,466,978	25,667,433	61,948,365	59,857,318	51,780,125	127,278,133	380,054,060	276,780,408	0.24	0.20	0.16	0.22
GERMANY	185,438,620	55,964,942	93,342,065	52,461,942	702,128,398	196,756,160	398,933,507	209,974,150	0.26	0.28	0.23	0.25
CANADA	71,666,308	62,832,618	72,071,465	50,170,458	257,490,269	225,102,528	298,935,805	213,074,101	0.28	0.28	0.24	0.24
VENEZ	21,307,549	12,731,859	2,626,328	40,808,493	91,100,604	52,610,987	15,117,420	188,707,891	0.23	0.24	0.17	0.22
CHINA	745,895	3,570,731	6,031,160	31,380,193	2,858,197	15,164,331	30,487,066	154,503,482	0.26	0.24	0.20	0.20
FINLAND	21,612,132	23,718,062	18,070,939	18,148,286	86,946,200	95,428,917	99,800,523	93,260,716	0.25	0.25	0.18	0.19
ITALY	4,556,894	2,123,935	11,822,898	10,585,831	9,475,187	5,567,270	52,002,916	48,443,991	0.48	0.38	0.23	0.22
POLAND	4,548,607	5,405,001	5,730,714	10,310,917	19,697,090	26,524,970	36,068,600	65,119,860	0.23	0.20	0.16	0.16
REP SAF	1,194,425	18,025,407	1,573,751	6,403,538	4,377,368	79,350,073	6,633,135	28,443,989	0.27	0.23	0.24	0.23
BELGIUM	3,468,908	6,246,805	7,861,114	6,213,331	8,114,618	16,340,766	31,354,015	18,211,741	0.43	0.38	0.25	0.34
NORWAY	0	0	0	5,614,201	0	0	0	28,210,832	#DIV/0!	#DIV/0!	#DIV/0!	0.20
U KING	38,027,611	24,834,365	9,223,136	4,678,798	124,441,613	86,170,112	38,410,465	12,226,556	0.31	0.29	0.24	0.38
TURKEY	771,102	15,931,009	0	3,386,682	2,163,400	79,545,547	0	6,878,225	0.36	0.20	#DIV/0!	0.49
FRANCE	6,235,533	7,122,645	5,047,720	2,200,848	24,852,124	37,699,468	30,390,043	10,642,404	0.25	0.19	0.17	0.21
PORTUGAL	0	4,155,212	0	1,726,168	0	20,339,240	0	8,743,295	#DIV/0!	0.20	#DIV/0!	0.20
MOLDOVA	0	0	0	1,669,838	0	0	0	7,441,346	#DIV/0!	#DIV/0!	#DIV/0!	0.22
NETHERLANDS	6,217,428	5,932,948	5,490,710	1,155,852	24,075,845	25,822,183	35,897,629	4,172,155	0.26	0.23	0.15	0.28
BELARUS	0	0	0	911,779	0	0	0	3,191,047	#DIV/0!	#DIV/0!	#DIV/0!	0.29
KOREA	45,515,767	17,845,885	8,480,330	61,892	183,422,839	90,724,641	37,365,997	138,395	0.25	0.20	0.23	0.45
INDIA	0	0	0	39,971	0	0	0	92,521	#DIV/0!	#DIV/0!	#DIV/0!	0.43
CZECH REP	0	114,053	0	15,715	0	310,600	0	34,388	#DIV/0!	0.37	#DIV/0!	0.46
TAIWAN	50,132	60,504	15,374	15,435	24,024	158,169	48,361	33,736	2.09	0.38	0.32	0.46
N ZEAL	0	0	7,980	3,525	0	0	26,600	11,750	#DIV/0!	#DIV/0!	0.30	0.30
ARGENTINA	1,663,532	393,409	17,100,104	0	4,442,560	1,050,380	93,958,640	0	0.37	0.37	0.18	#DIV/0!
AUSTRIA	32,988	0	0	0	91,800	0	0	0	0.36	#DIV/0!	#DIV/0!	#DIV/0!
DENMARK	0	13,340	0	0	0	32,710	0	0	#DIV/0!	0.41	#DIV/0!	#DIV/0!
IRELAND	2,859	2,703	0	0	115	3,831	0	0	24.86	0.71	#DIV/0!	#DIV/0!
LATVIA	0	4,722,014	0	0	0	21,860,166	0	0	#DIV/0!	0.22	#DIV/0!	#DIV/0!
SPAIN	0	208,819	13,146	0	0	318,324	19,012	0	#DIV/0!	0.66	0.69	#DIV/0!
SWEDEN	7,481,209	14,798,791	0	0	29,784,685	49,197,088	0	0	0.25	0.30	#DIV/0!	#DIV/0!
SWITZLD	0	90,326	0	0	0	193,843	0	0	#DIV/0!	0.47	#DIV/0!	#DIV/0!